

THE MCDANIEL LAW FIRM, PC

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Attorneys for Plaintiff Baseprotect USA, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BASEPROTECT USA, INC.

Plaintiff,

v.

SWARM C32E9¹, an unincorporated joint
enterprise, and JOHN DOES 1-X, such
persons being presently unknown
participants and members of the joint
enterprise,

Defendants.

2:11-cv-7292 (SDW)(MCA)

**CROSS MOTION FOR ENTRY OF
PRELIMINARY INJUNCTION**

TO: John Doe No. 22.
(IP Address. 76.108.204.117)

PLEASE TAKE NOTICE that Plaintiff Baseprotect USA, Inc. will move before this Court on **July 18, 2012 at 9:00 A.M.** or as soon thereafter as counsel may be heard, for an Order granting a Preliminary Injunction to enjoin and restrain Defendant Swarm # C32E9 and Doe Defendant identified by IP address 76.108.204.117 from the continuing unlawful distribution of the copyrighted work Weekend on the Internet and, further, from destroying evidence of previous unlawful distribution of the work that is discoverable later in the litigation.

TAKE FURTHER NOTICE that in support thereof, Plaintiff shall rely on the within Declaration of David Farris and Memorandum of Law.

TAKE FURTHER NOTICE that oral argument is requested.

DATED: July 3, 2012

THE MCDANIEL LAW FIRM, P.C.

¹ The alpha-numeric hash file assigned to this unique copy of the copyrighted work is truncated. See Schedule A to the Complaint for the complete hash.

A handwritten signature in black ink, appearing to read "Jay R. McDaniel".

By: _____

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